

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kevin P.B. Johnson (Bar No. 177129)

kevinjohnson@quinnemanuel.com

Todd M. Briggs (Bar No. 209282)

toddbriggs@quinnemanuel.com

David E. Myre (Bar No. 304600)

davidmyre@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065-2139

Telephone: (650) 801-5000

Facsimile: (650) 801-5100

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Edward J. DeFranco (Bar No. 165596)

eddefranco@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

Telephone: (212) 849-7000

Facsimile: (212) 849-7100

SINGER / BEA LLP

Benjamin L. Singer (Bar No. 264295)

bsinger@singerbea.com

Renee Bea (Bar No. 268807)

rbea@singerbea.com

601 Montgomery Street, Suite 1950

San Francisco, California 94111

Telephone: (415) 500-6080

Facsimile: (415) 500-7080

Attorneys for Plaintiff

TELESOCIAL, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

TELESOCIAL, INC.,

Plaintiff,

vs.

ORANGE S.A., et al.,

Defendants.

CASE NO. 3:14-CV-03985-JD

**DECLARATION OF TODD BRIGGS IN
SUPPORT OF TELESOCIAL'S
SUPPLEMENTAL BRIEFING ON
ORANGE'S MOTION TO EXCLUDE
THE OPINIONS AND TESTIMONY OF
PROFESSOR GEORGE FOSTER**

Judge: Hon. James Donato

Ctrrm.: 11, 19th Floor

Action Filed: Sept. 2, 2014

FAC Filed: Dec. 15, 2014

Trial Date: April 10, 2017

1 I, Todd M. Briggs, declare and state as follows.

2 1. I am an attorney duly licensed to practice law in the State of California. I am a
3 partner at Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Telesocial, Inc.
4 (“Telesocial”) in this action. I submit this declaration in support of Telesocial’s Supplemental
5 Briefing on Orange’s Motion to Exclude the Opinions and Testimony of Professor George Foster.

6 2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
7 deposition of Ylva Rham, taken on September 30, 2016 by Defendants in this action.

8 3. Attached hereto as Exhibit B is a true and correct copy of the California Court of
9 Appeal’s decision in *Vehicular Techs. Corp. v. Titan Wheel Intern., Inc.*, 2005 WL 1460296 (June
10 22, 2005), downloaded from Westlaw Next on March 13, 2017.

11 4. Attached hereto as Exhibit C is a true and correct copy of an excerpt from the
12 March 9, 2017 hearing before the Court regarding Orange’s Motion for Summary Judgment and
13 Daubert Motions.

14
15 I declare under penalty of perjury that the foregoing is true and correct.

16 DATED: March 13, 2017

17 Redwood City, California

18
19 By: /s/Todd M. Briggs
20 Todd M. Briggs
21
22
23
24
25
26
27
28